

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

IN RE:

O&G LEASING, LLC

CASE NO. 10-01851-EE

PERFORMANCE DRILLING COMPANY, LLC

CASE NO. 10-01852-EE

**CHAPTER 11
Joint Administration Requested**

**FIRST SECURITY BANK AS TRUSTEE'S RESPONSE
DEBTORS' MOTION FOR AUTHORITY TO PAY
CERTAIN PRE-PETITION EMPLOYEE OBLIGATIONS (DK #19)**

First Security Bank, as trustee pursuant to that certain Amended and Restated Trust Indenture, dated September 15, 2009 (“Amended and Restated Trust Indenture”) (“First Security”), a creditor and party in interest in this proceeding, for its response to Debtors’ Motion for Authority to Pay Certain Pre-Petition Employee Obligations (DK#19) would state as follows:

1. First Security is a secured creditor with a perfected first lien on all the Debtors’ assets.

The funds used to pay the pre-petition employee obligations constitute cash collateral of First Security. First Security objects to the use of its cash collateral to pay the pre-petition employee obligations.

2. First Security objects to the motion that on the basis that it seeks authority to pay pre-petition management fees to affiliated companies which fees will be used to pay undisclosed compensation to the president and CEO of the Debtors.

3. First Security also objects on grounds to be set forth at a hearing hereof.

This 27th day of May, 2010.

Respectfully submitted,

FIRST SECURITY BANK, AS TRUSTEE

By: /s/ Jim F. Spencer, Jr.
Jim F. Spencer, Jr.

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Jim F. Spencer, Jr., hereby certify that I have this day caused to be served by electronic mail a true and correct copy of the foregoing document to the following counsel of record:

Douglas C. Noble, Esq.
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Ronald.McAlpin@usdoj.gov

This 27th day of May 2010.

/s/ Jim F. Spencer, Jr.
Jim F. Spencer, Jr.